

REDISTRICTING PANEL

Sachs Plaintiffs' Congressional and Legislative Plans

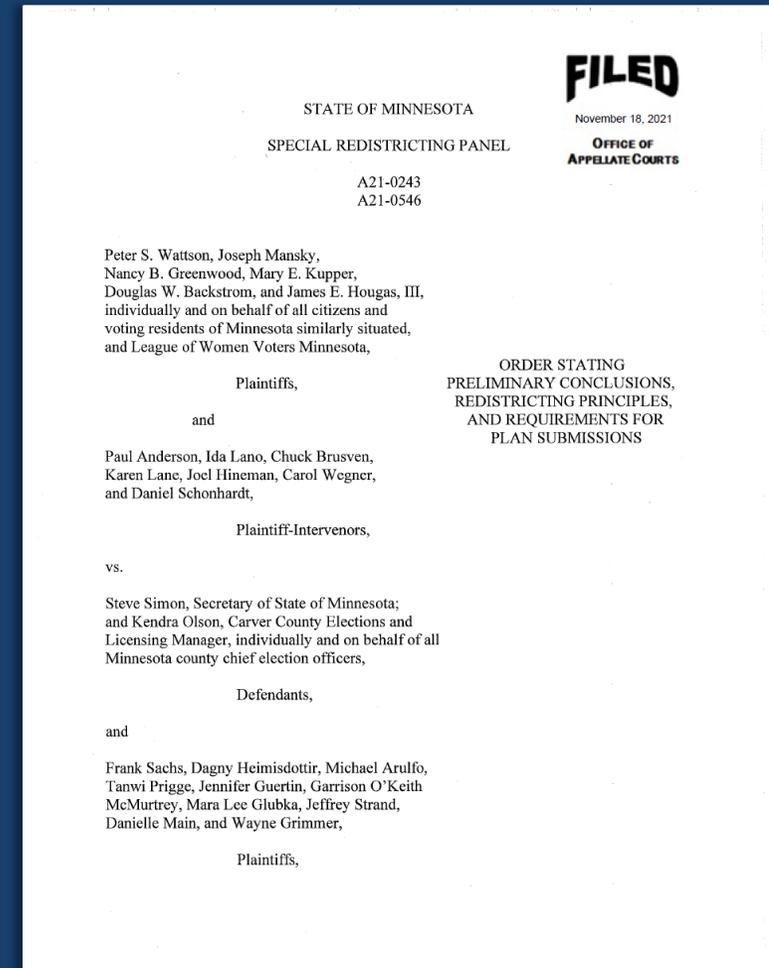
Morning Presentation

Oral Argument - January 4, 2022

CONGRESSIONAL PLAN

SACHS CONGRESSIONAL PLAN

- Preserves Minority Voting Strength
- Contains Convenient and Compact Districts
- Preserves Political Subdivisions
- Recognizes Communities of Interest
- Follows the Court's Criteria While Striking a Balance Between Preserving What Works and Updating What Has Changed



CD 7 AND CD8 MUST EXPAND...

District	2020 Population	Deviation from Ideal (People)	Deviation from Ideal (Percentage)
1	690,726	-22,586	-3.17%
2	731,958	18,646	2.61%
3	737,898	24,586	3.45%
4	726,476	13,164	1.85%
5	736,036	22,724	3.19%
6	733,957	20,645	2.89%
7	673,514	-39,798	-5.58%
8	675,929	-37,383	-5.24%

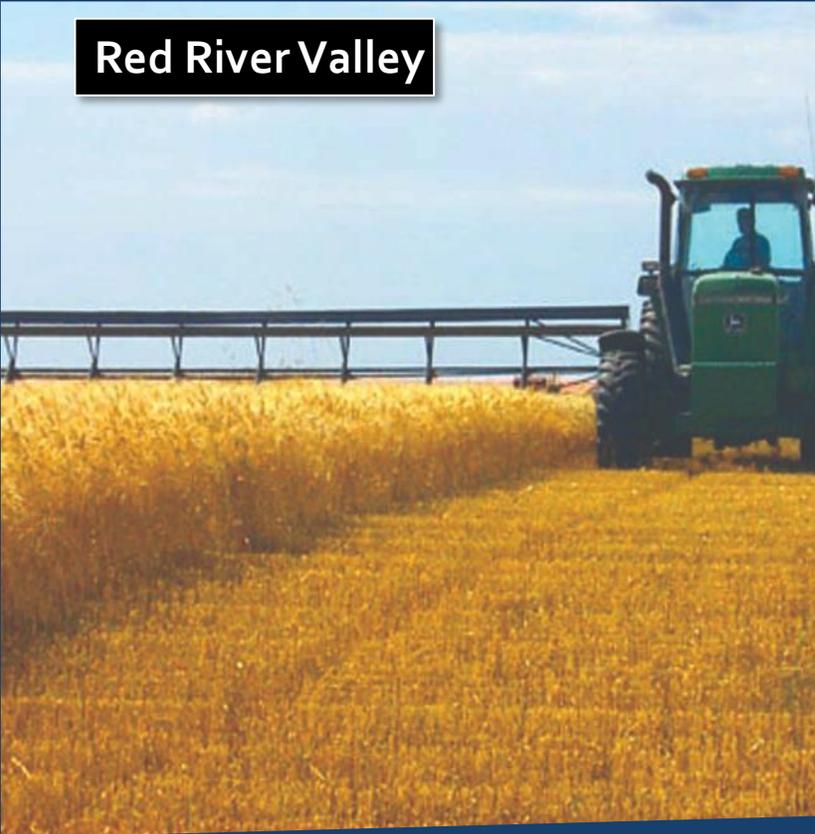
...BUT WHERE?



Districts of 113th Congress
<http://nationalatlas.gov>

NORTHWESTERN AND NORTHEASTERN MINNESOTA DIFFER SIGNIFICANTLY

Red River Valley

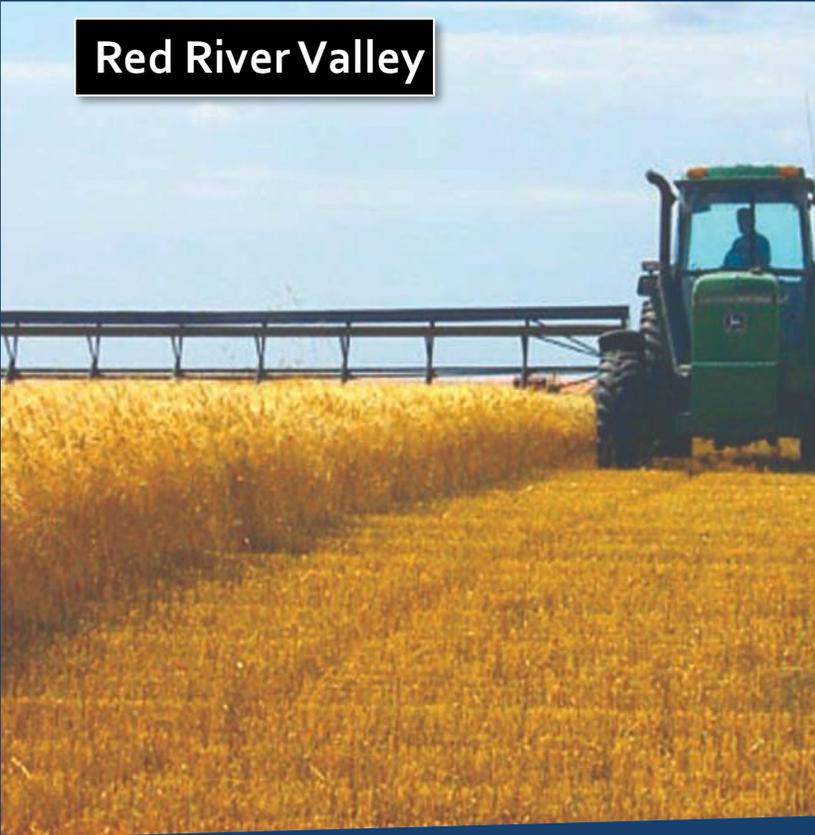


Hull Rust Mahoning Mine



WESTERN MINNESOTA AND CENTRAL MINNESOTA DIFFER SIGNIFICANTLY

Red River Valley



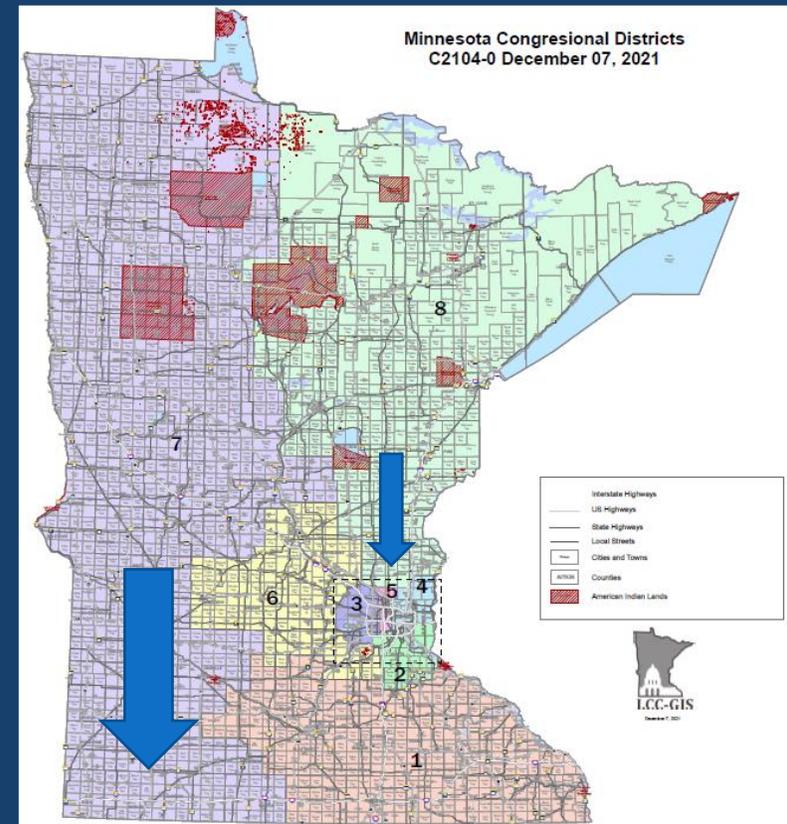
St. Cloud



FOR CD7 AND CD8, EXPANSION SOUTH MAKES MOST SENSE

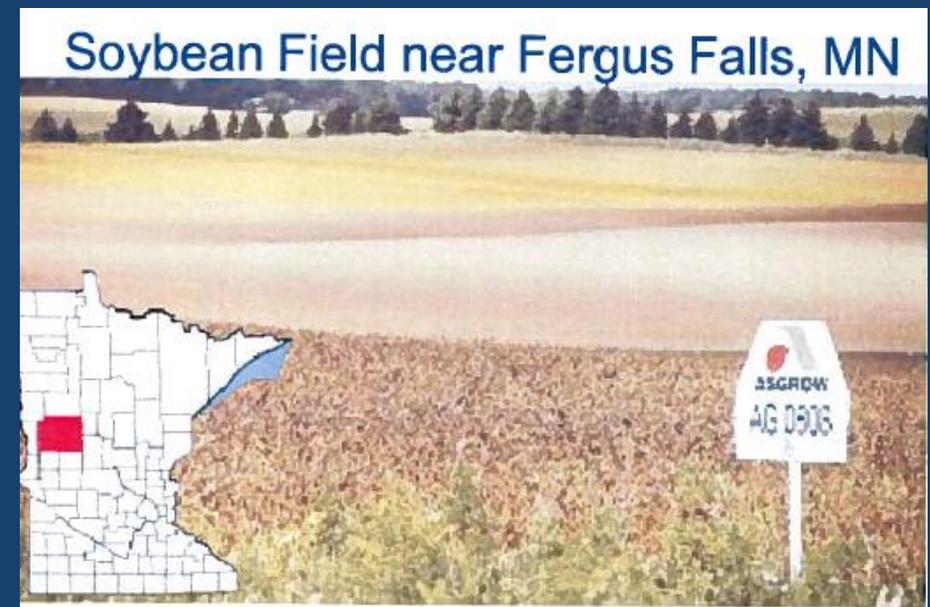
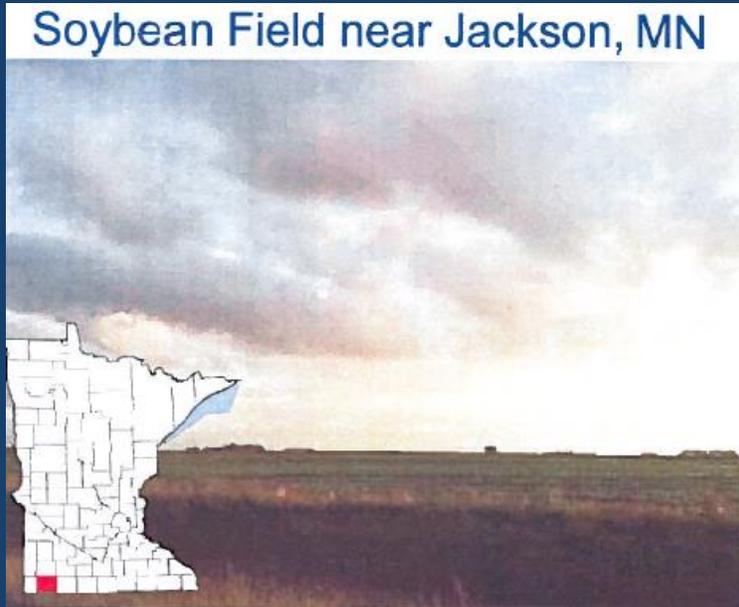
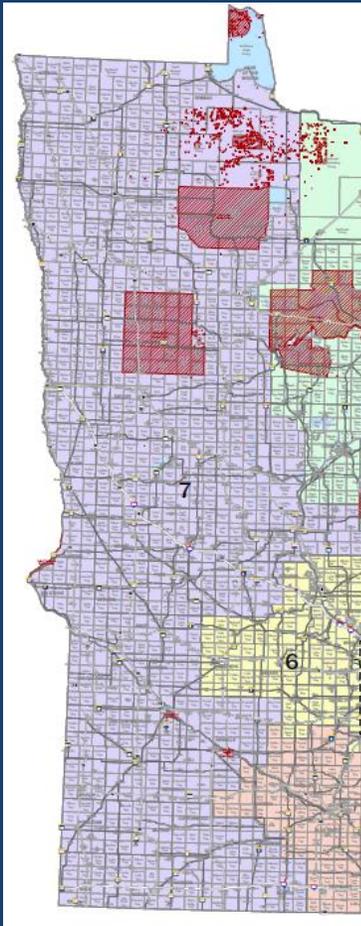


Enacted Map



Sachs Map

SACHS CD7: UNITE WESTERN MINNESOTA'S AGRICULTURAL REGIONS



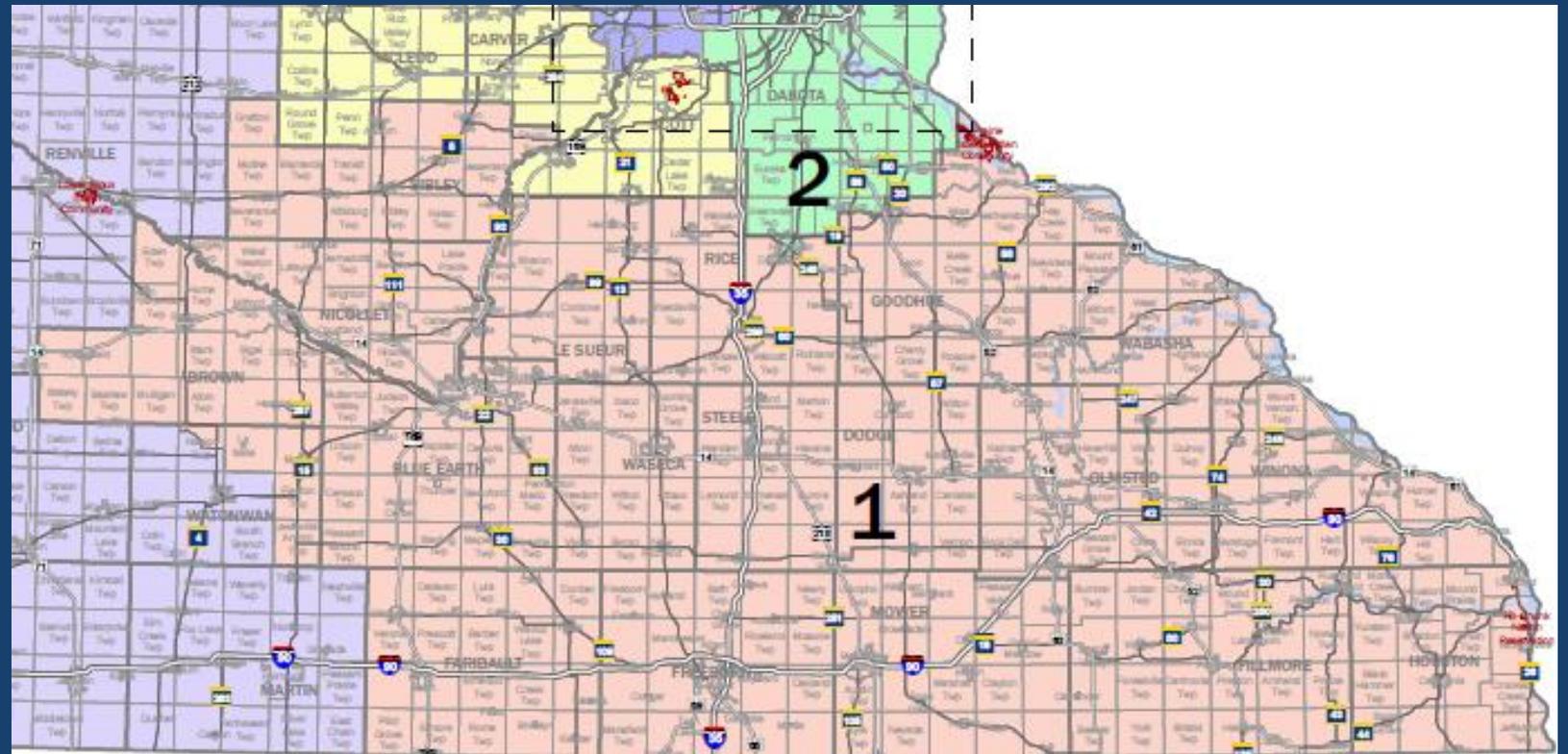
CURRENT CD 1



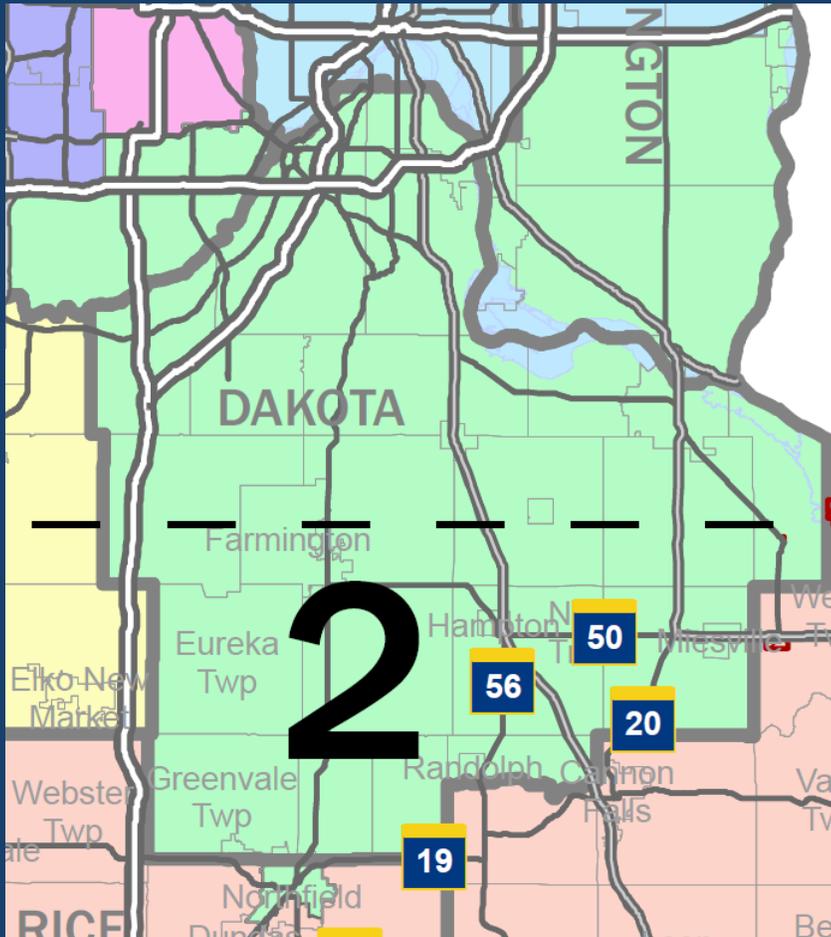
- Linked by I-90
- No meaningful connection between counties in the southwest and those in the southeast

SACHS CD 1

- More compact
- Unites SE Mississippi River counties
- Anchored in Mankato & Rochester regional hubs



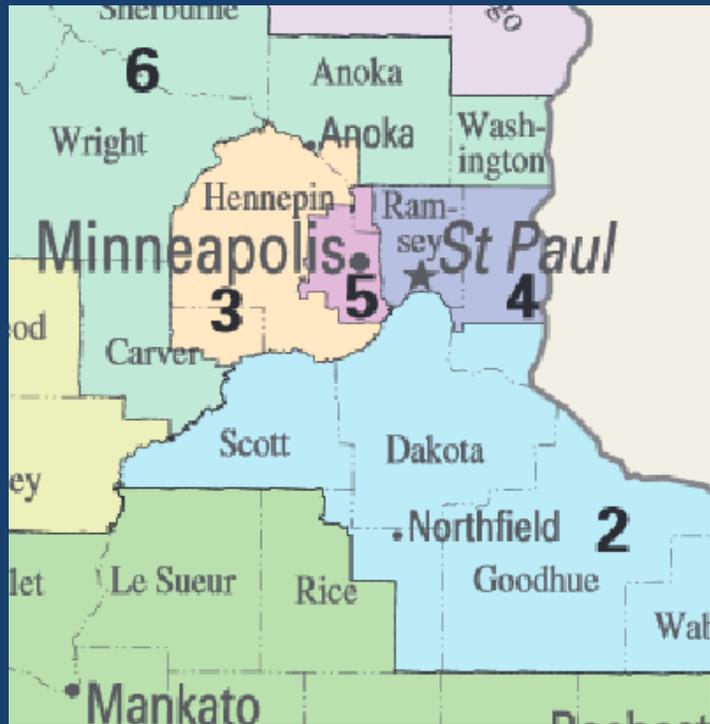
SACHS CD 2: UNITES SOUTHEASTERN SUBURBAN COMMUNITIES



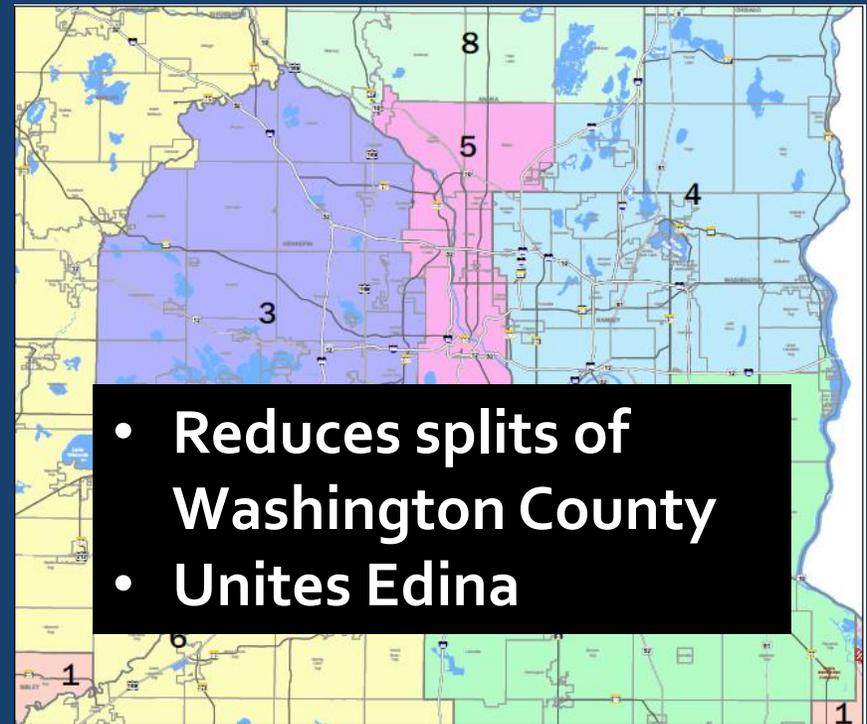
“Much of our lives take place in the south metro area regardless of whether it is Eagan or Bloomington.”

Written Comments 87 (testimony of J. Nicolai)

TWIN CITIES: SUBSTANTIALLY SIMILAR, WITH IMPROVEMENTS



Enacted Map



- Reduces splits of Washington County
- Unites Edina

Sachs Map

SACHS CONGRESSIONAL PLAN: ENSURING MINORITY REPRESENTATION

District	Black	%	Asian	%	Hispanic	%	Indian	%	Other	%	Total Minority	%
4	50,507	9.2	62,104	11.3	33,486	6.1	2,920	0.5	20,732	3.8	169,749	30.8
5	82,063	14.6	40,290	7.2	44,803	8.0	5,168	0.9	25,009	4.4	197,333	35.1

District	Black	%	Asian	%	Hispanic	%	Indian	%	Other	%	Total Minority	%
1	16,793	3	14,294	3	26,862	5	1,722	0	14,185	3	73,856	13
2	34,606	6	33,913	6	39,159	7	2,001	0	20,175	4	129,854	24
3	39,984	7	38,837	7	22,286	4	1,419	0	18,744	3	121,270	22
4	50,507	9	62,104	11	33,486	6	2,920	1	20,732	4	169,749	31
5	82,063	15	40,290	7	44,803	8	5,168	1	25,009	4	197,333	35
6	19,330	4	13,858	3	20,381	4	2,205	0	15,130	3	70,904	13
7	6,206	1	5,226	1	23,222	4	12,199	2	15,209	3	62,062	11
8	7,864	1	6,159	1	8,568	2	11,926	2	20,435	4	54,952	10

State Totals

	257,353	6	214,681	5	218,767	5	39,560	1	149,619	0	879,980	20
--	---------	---	---------	---	---------	---	--------	---	---------	---	---------	----

LEGISLATIVE PLAN

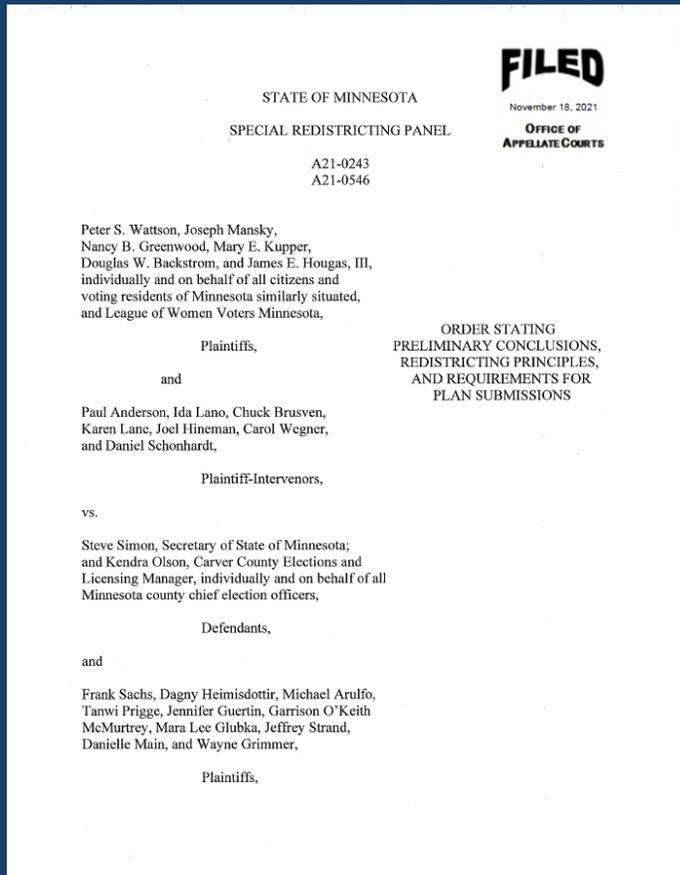
SACHS LEGISLATIVE PLAN

- Embraces the Panel's Redistricting Principles
- Responds to Public Testimony
- Creates Fair Maps to Address Population Shifts and Demographic Changes

EMBRACES THE PANEL'S REDISTRICTING PRINCIPLES

- *De minimis deviation* from ideal populations
- Protect *equal opportunity for minority groups* to participate in the political process
- Preserve *American Indian reservation* lands
- Avoid dividing *political subdivisions*
- Preserve *communities of interest*
- Not drawn to protect *incumbents, candidates, or parties*
- *Contiguous* and *convenient*
- *Compact*

THE SACHS LEGISLATIVE PLAN ACHIEVES A *DE MINIMIS* DEVIATION FROM IDEAL POPULATIONS



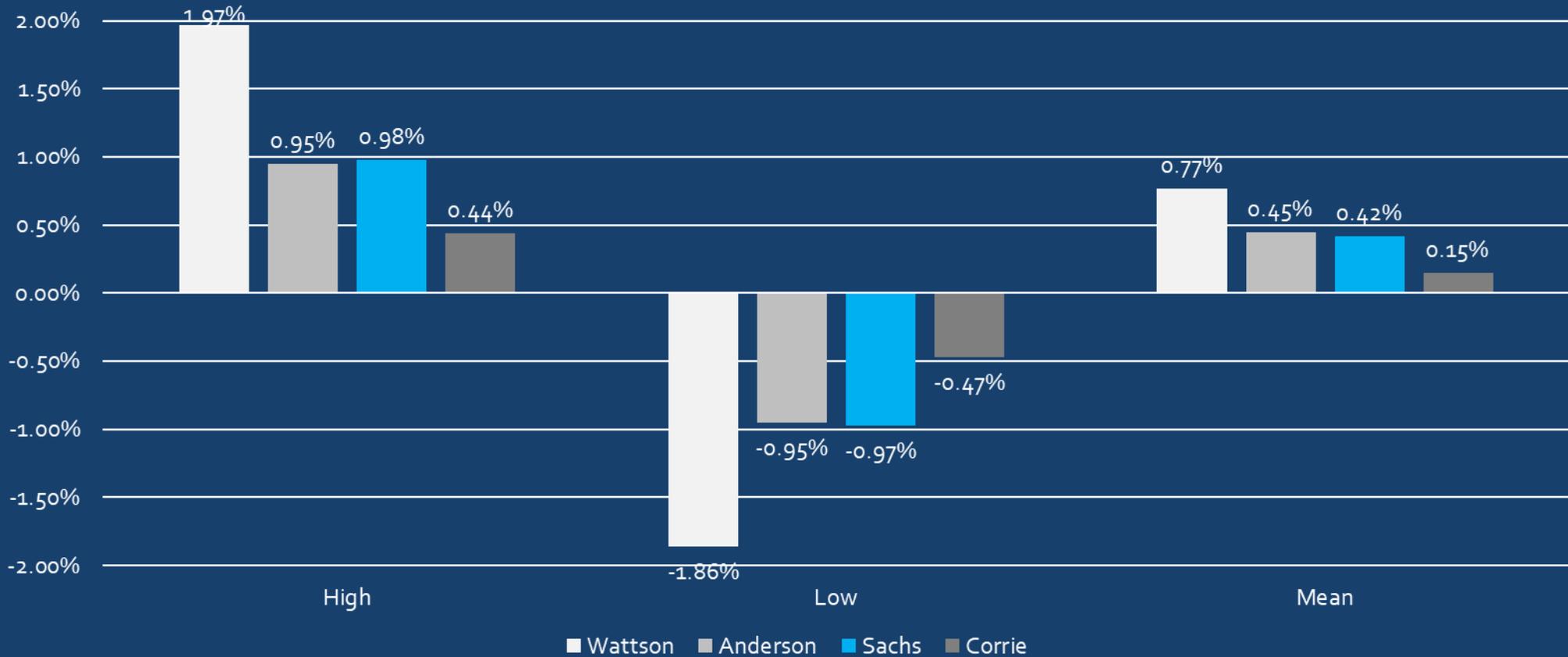
State legislative districts must also adhere to the concept of population-based representation. Some deviation from perfect equality is permissible to accommodate a state's clearly identified, legitimate policy objectives. But a court performing the task of redistricting is held to a high standard of population equality. Accordingly, the goal is de minimis deviation from the ideal district population. The population of a legislative district must not deviate by more than two percent from the population of the ideal district. This is a maximum deviation, not a level under which all population deviations will be presumed acceptable. Order at 5-6 (citations omitted).

- Ideal Senate District Population: 85,172
- Ideal House District Population: 42,586

POPULATION DEVIATIONS – SENATE

	High	Low	Mean
Sachs Plaintiffs	0.98 (832)	-0.97 (-828)	0.42 (359)
Wattson Plaintiffs	1.97 (1,676)	-1.86 (-1,586)	0.77 (656)
Anderson Plaintiffs	0.95 (811)	-0.95 (-809)	0.45 (381)
Corrie Plaintiffs	0.44 (371)	-0.47 (-400)	0.15 (127)

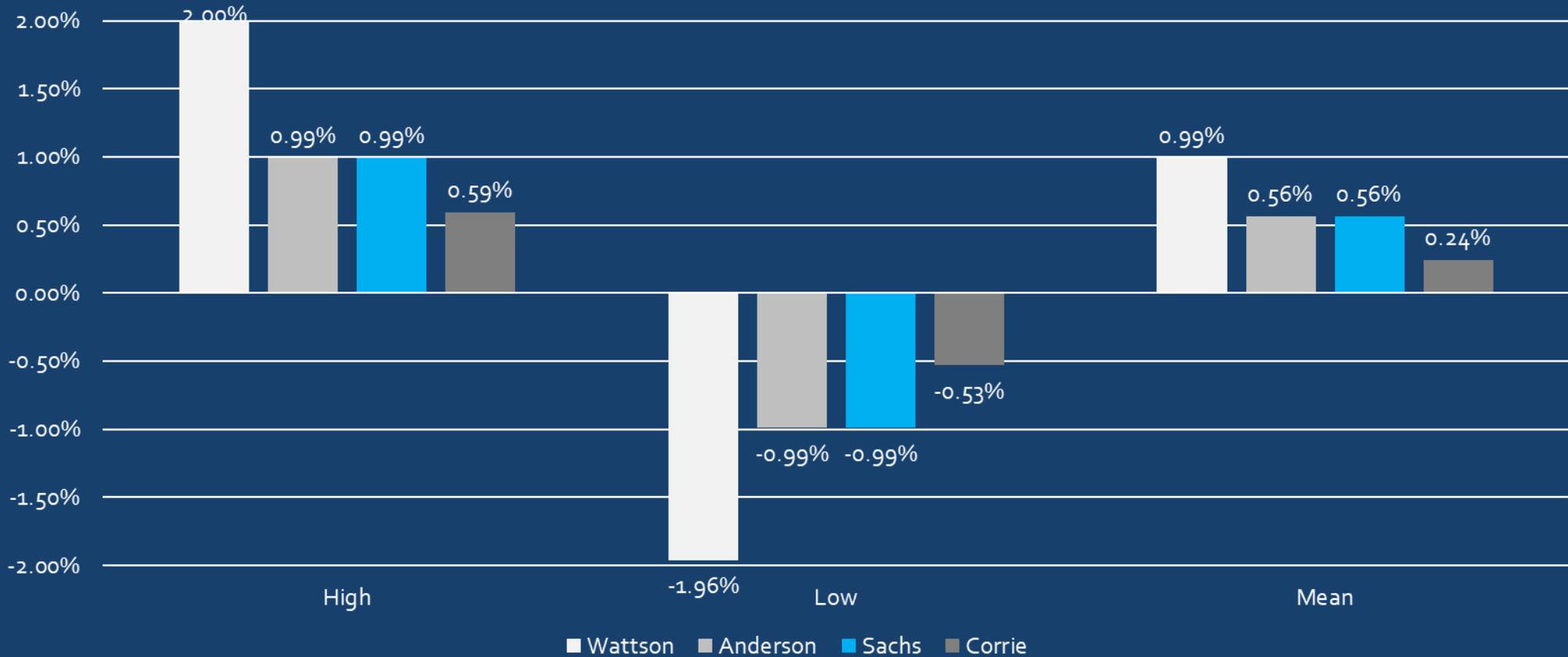
POPULATION DEVIATION – SENATE



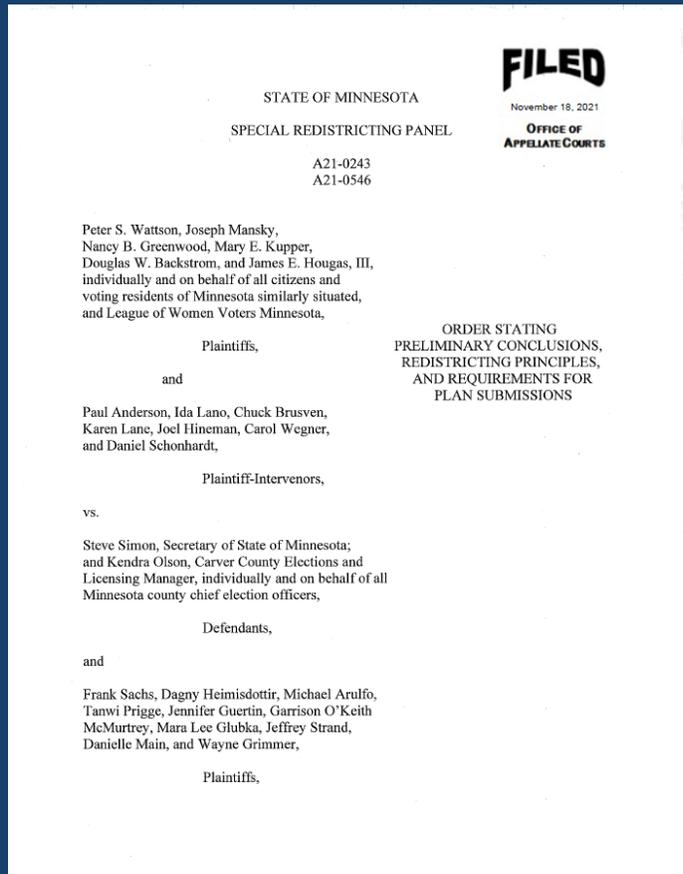
POPULATION DEVIATIONS – HOUSE

	High	Low	Mean
Sachs Plaintiffs	0.99 (422)	-0.99 (-422)	0.56 (237)
Wattson Plaintiffs	2.00 (852)	-1.96 (-836)	0.99 (421)
Anderson Plaintiffs	0.99 (420)	-0.99 (-422)	0.56 (240)
Corrie Plaintiffs	0.59 (250)	-0.53 (-227)	0.24 (104)

POPULATION DEVIATION – HOUSE



THE SACHS LEGISLATIVE PLAN PROTECTS THE EQUAL OPPORTUNITY FOR MINORITY GROUPS TO PARTICIPATE IN THE POLITICAL PROCESS



*Districts must not be drawn with either the purpose or effect of denying or abridging the voting rights of any United States citizen on account of race, ethnicity, or membership in a language minority group. **Districts shall be drawn to protect the equal opportunity of racial, ethnic, and language minorities to participate in the political process and elect candidates of their choice, whether alone or in alliance with others.** Order at 6 (citations omitted).*

MINORITY REPRESENTATION DISTRICTS – SENATE

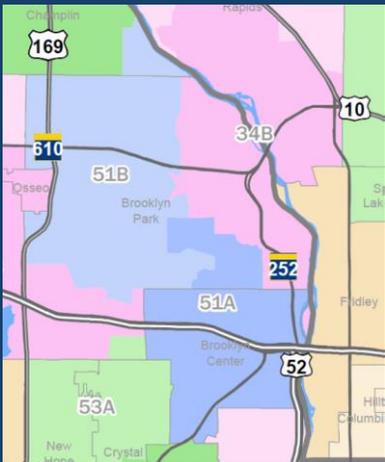
	Majority-Minority Districts	Minority Opportunity Districts	Total
Sachs Plaintiffs	3	6	9
Wattson Plaintiffs	4	6	10
Anderson Plaintiffs	4	5	9
Corrie Plaintiffs	5	5	10

MINORITY SENATE DISTRICTS

SD 51

57% Voting Age Pop.

- Majority-Minority
- All of Brooklyn Center
- Central Brooklyn Park



SD 59

56.6% Voting Age Pop.

- Majority-Minority
- Similar to current SD 59
- North Minneapolis
- The North Loop
- Western downtown



SD 62

49.1 % Voting Age Pop.

- Minority Opportunity
- East downtown
- South Minneapolis, east of the Lakes



SD 65

48.3% Voting Age Pop.

- Minority Opportunity
- Central St. Paul
- Downtown St. Paul



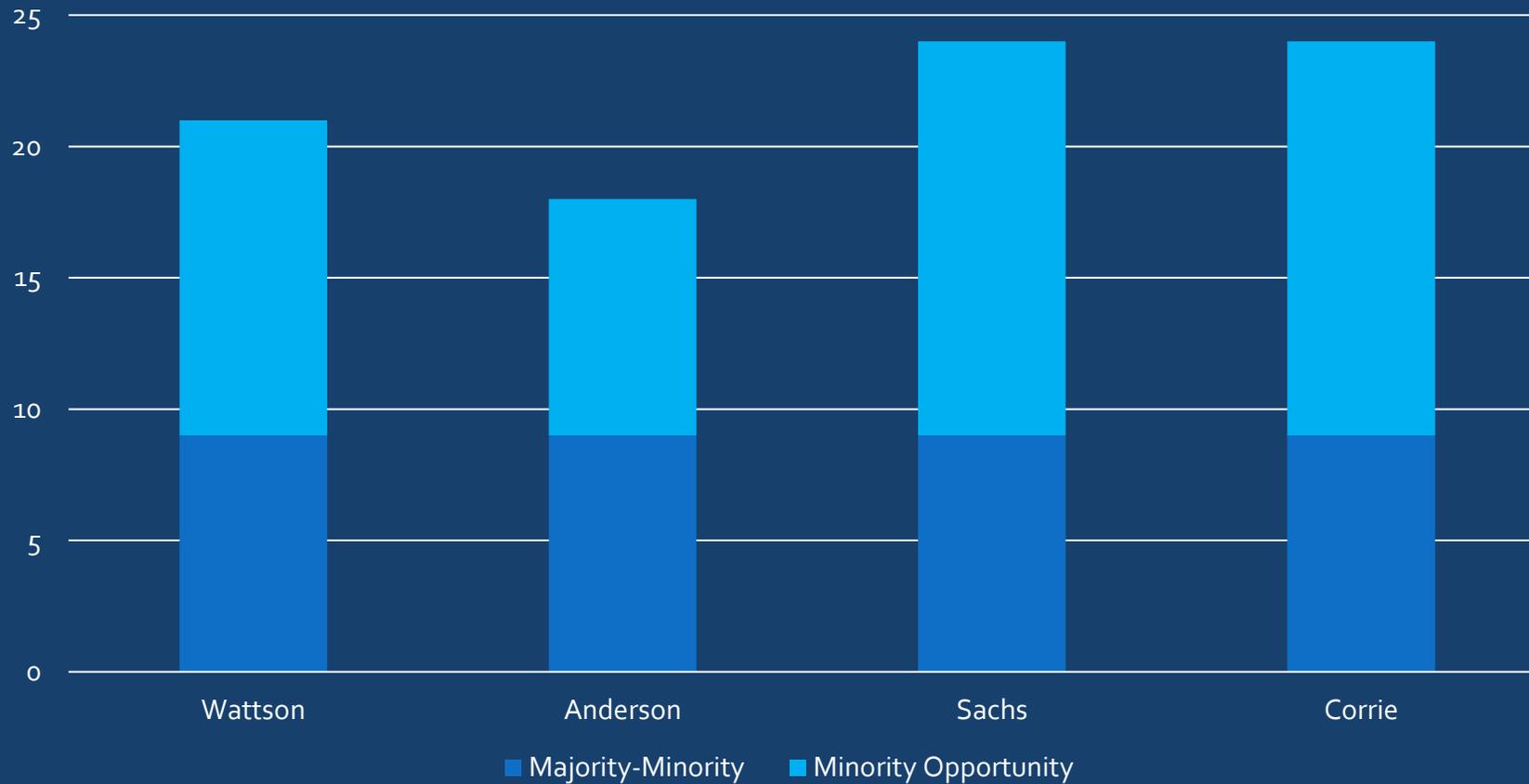
SD 67

62.6% Voting Age Pop.

- Majority-Minority
- Similar to current SD 67
- East St. Paul

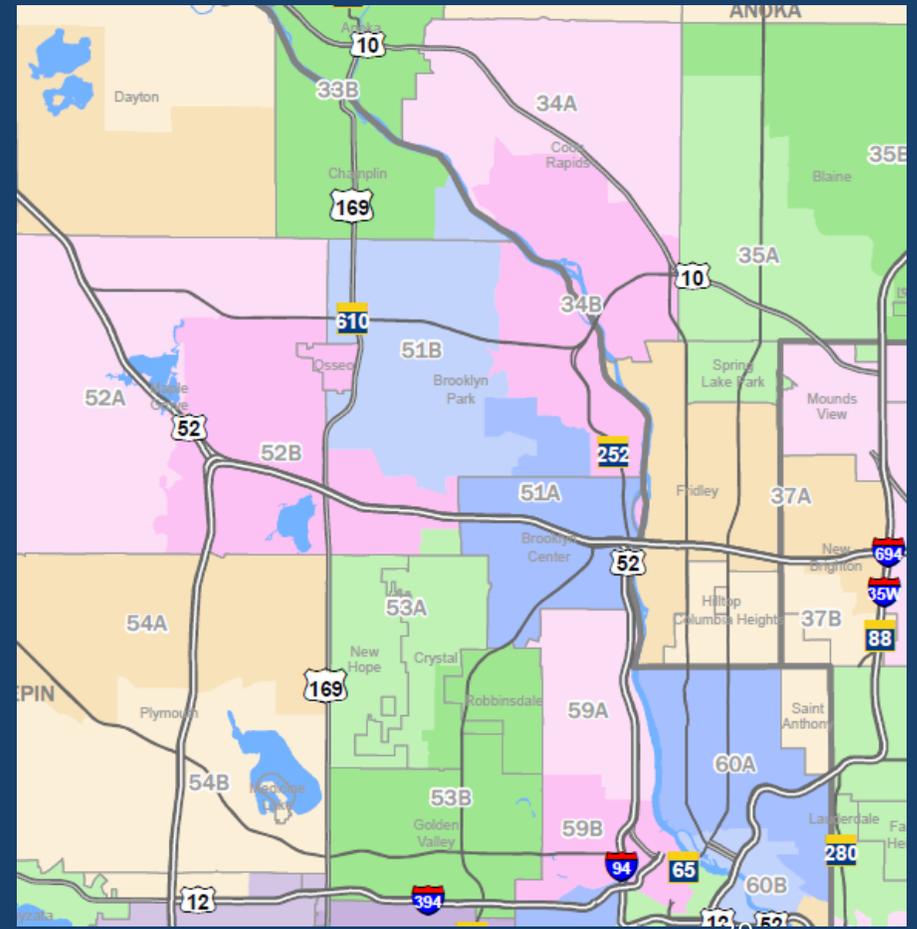


MINORITY REPRESENTATION DISTRICTS – HOUSE



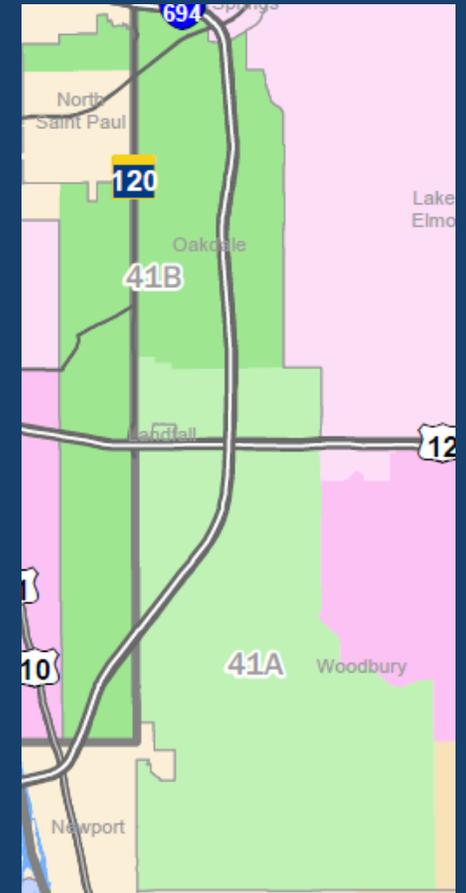
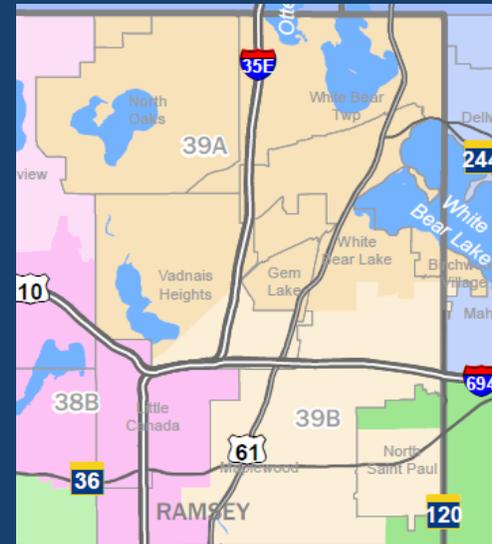
MINORITY HOUSE DISTRICTS – NORTHWESTERN SUBURBS

District	Black %	Asian %	Hispanic %	Total %
34B	13.8	12.1	4.5	35.0
37A	13.3	6.8	7.3	32.1
37B	13.7	6.4	9.6	34.4
51A	25.7	18.2	11.1	60.2
51B	26.3	17.8	5.4	53.9
52B	14.5	6.9	5.7	31.0
53A	16.9	4.6	7.4	33.5



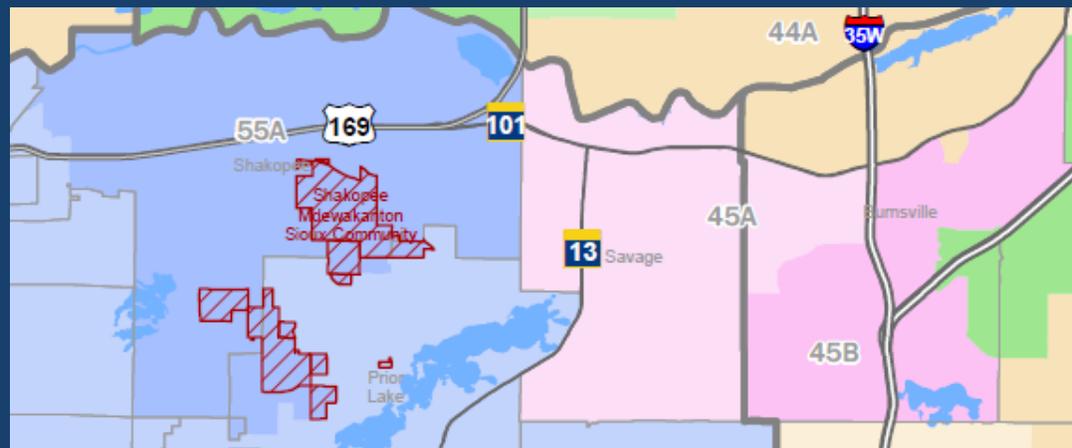
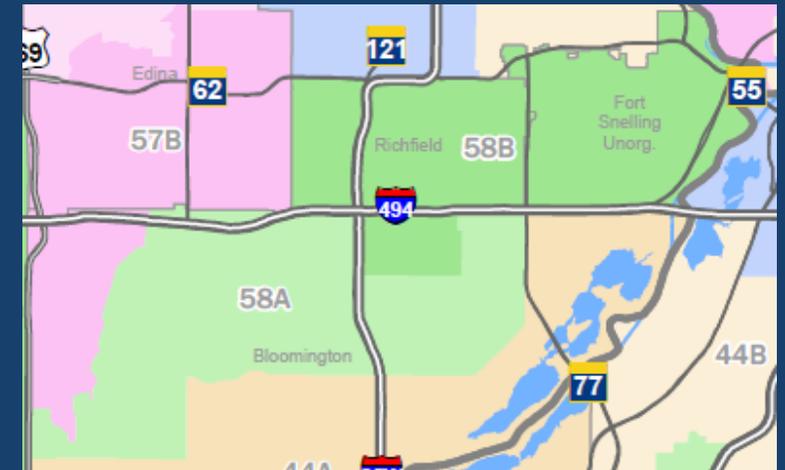
MINORITY HOUSE DISTRICTS – NORTHEASTERN AND EASTERN SUBURBS

District	Black %	Asian %	Hispanic %	Total %
39B	8.1	13.4	5.7	31.2
41B	8.6	11.4	6.3	30.4



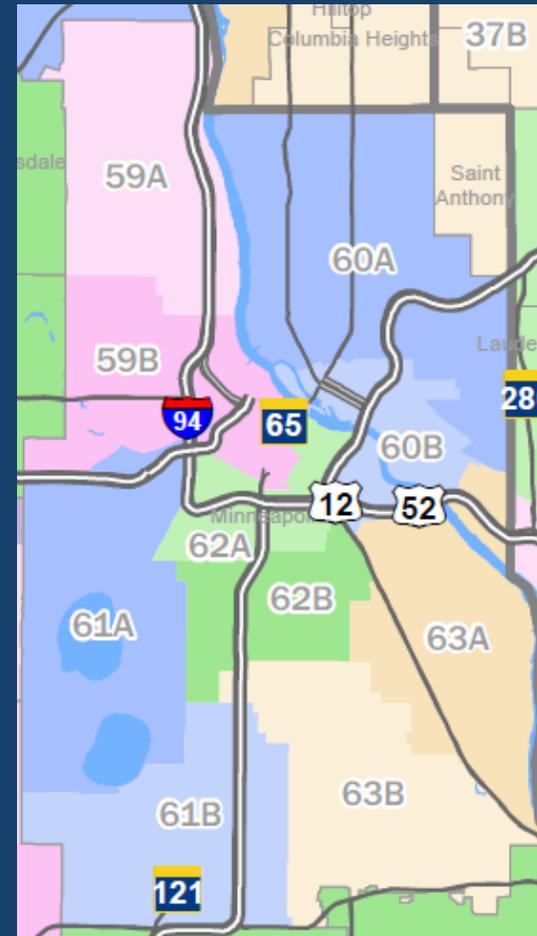
MINORITY HOUSE DISTRICTS – WESTERN AND SOUTHERN SUBURBS

District	Black %	Asian %	Hispanic %	Total %
45B	11.0	5.3	9.6	30.2
55A	7.8	12.2	8.0	33.3
58A	9.5	6.8	9.5	30.4
58B	9.1	7.1	14.9	36.0



MINORITY HOUSE DISTRICTS - MINNEAPOLIS

District	Black %	Asian %	Hispanic %	Total %
59A	33.1	10.3	10.7	61.7
59B	30.2	9.0	7.0	52.0
60B	13.4	15.2	4.7	38.1
62A	21.4	4.4	9.2	41.8
62B	23.4	2.8	24.2	57.6
63A	13.8	4.0	7.6	31.2



THE SACHS LEGISLATIVE PLAN PRESERVES AMERICAN INDIAN RESERVATION LANDS

STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL
A21-0243
A21-0546

FILED
November 18, 2021
OFFICE OF
APPELLATE COURTS

Peter S. Watson, Joseph Mansky,
Nancy B. Greenwood, Mary E. Kupper,
Douglas W. Backstrom, and James E. Hougas, III,
individually and on behalf of all citizens and
voting residents of Minnesota similarly situated,
and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven,
Karen Lane, Joel Hineman, Carol Wegner,
and Daniel Schonhardt,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of Minnesota;
and Kendra Olson, Carver County Elections and
Licensing Manager, individually and on behalf of all
Minnesota county chief election officers,

Defendants,

and

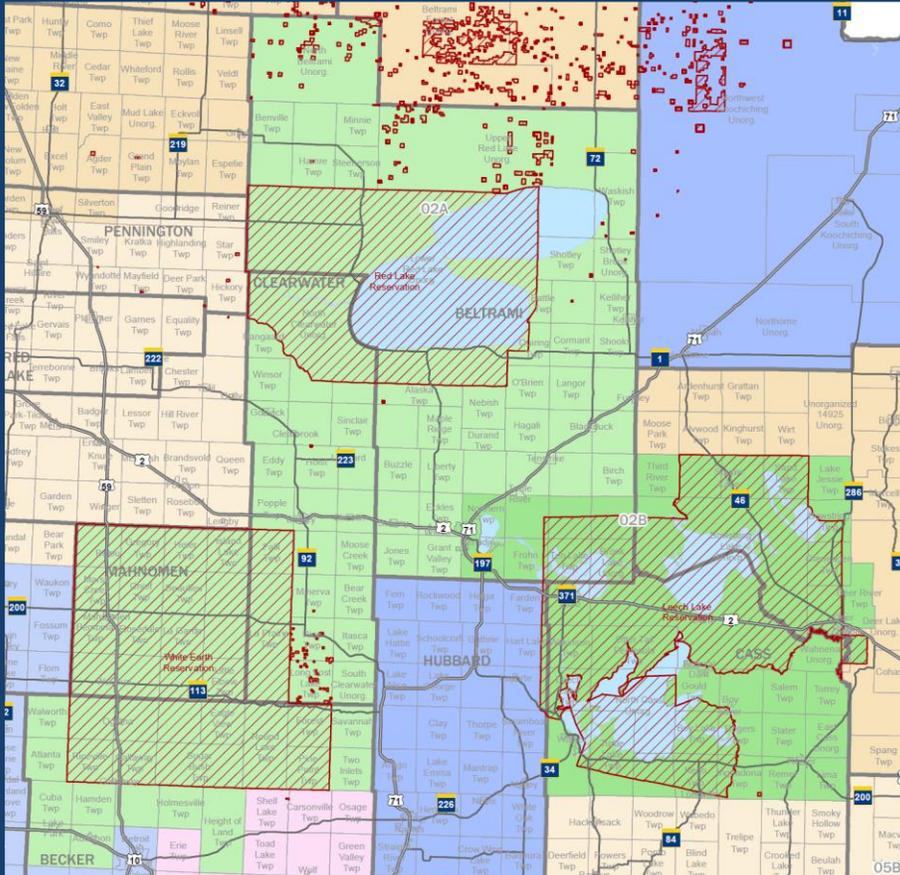
Frank Sachs, Dagny Heimisdottir, Michael Arulfo,
Tanwi Prigge, Jennifer Guertin, Garrison O'Keith
McMurtrey, Mara Lee Glubka, Jeffrey Strand,
Danielle Main, and Wayne Grimmer,

Plaintiffs,

ORDER STATING
PRELIMINARY CONCLUSIONS,
REDISTRICTING PRINCIPLES,
AND REQUIREMENTS FOR
PLAN SUBMISSIONS

The reservation lands of a federally recognized American Indian tribe will be preserved and must not be divided more than necessary to meet constitutional requirements. Placing discontinuous portions of reservation lands in separate districts does not constitute a division. Order at 6 (citations omitted).

THE SACHS LEGISLATIVE PLAN PRESERVES AMERICAN INDIAN RESERVATION LANDS

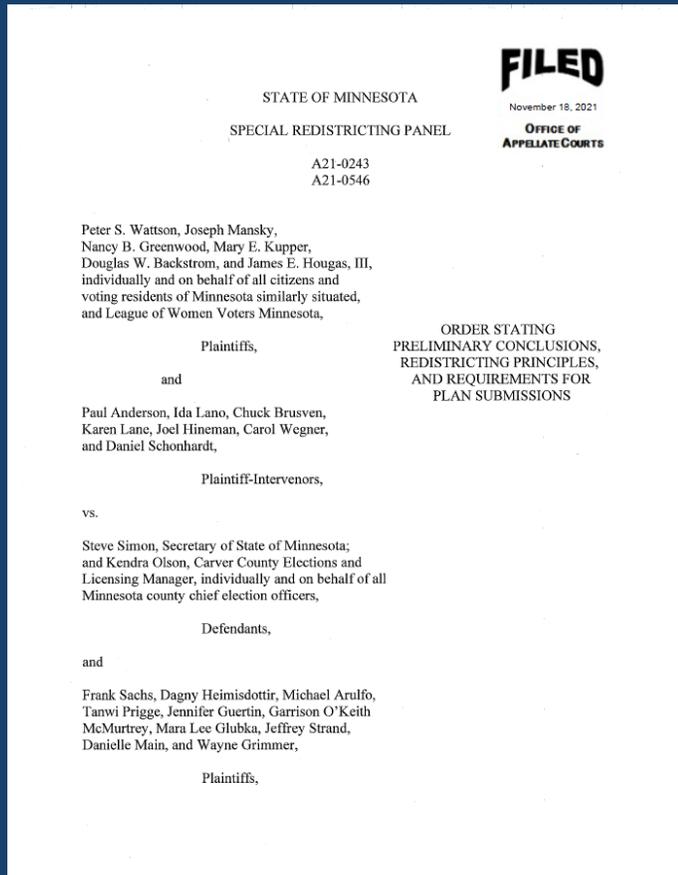


The Sachs Legislative Plan does not divide any contiguous portions of an American Indian reservation.

The Sachs Legislative Plan enhances the power of the Native American vote in northwestern Minnesota.

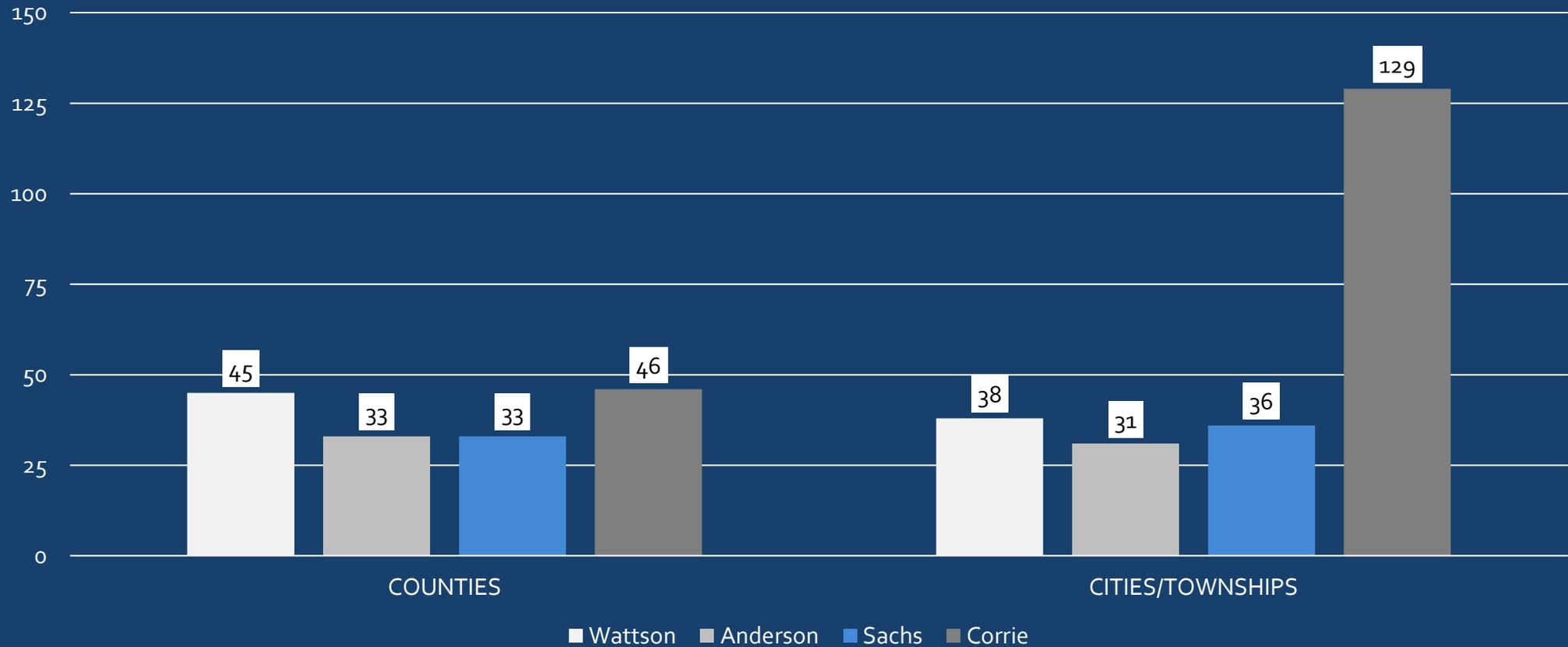
- Red Lake Nation and White Earth Band are included in House District 2A.
 - 28 percent minority voting-age population
- Leech Lake Band joins Red Lake Nation and White Earth Band in Senate District 2, along with Bemidji
 - 26 percent minority voting-age population

PRESERVE POLITICAL SUBDIVISIONS

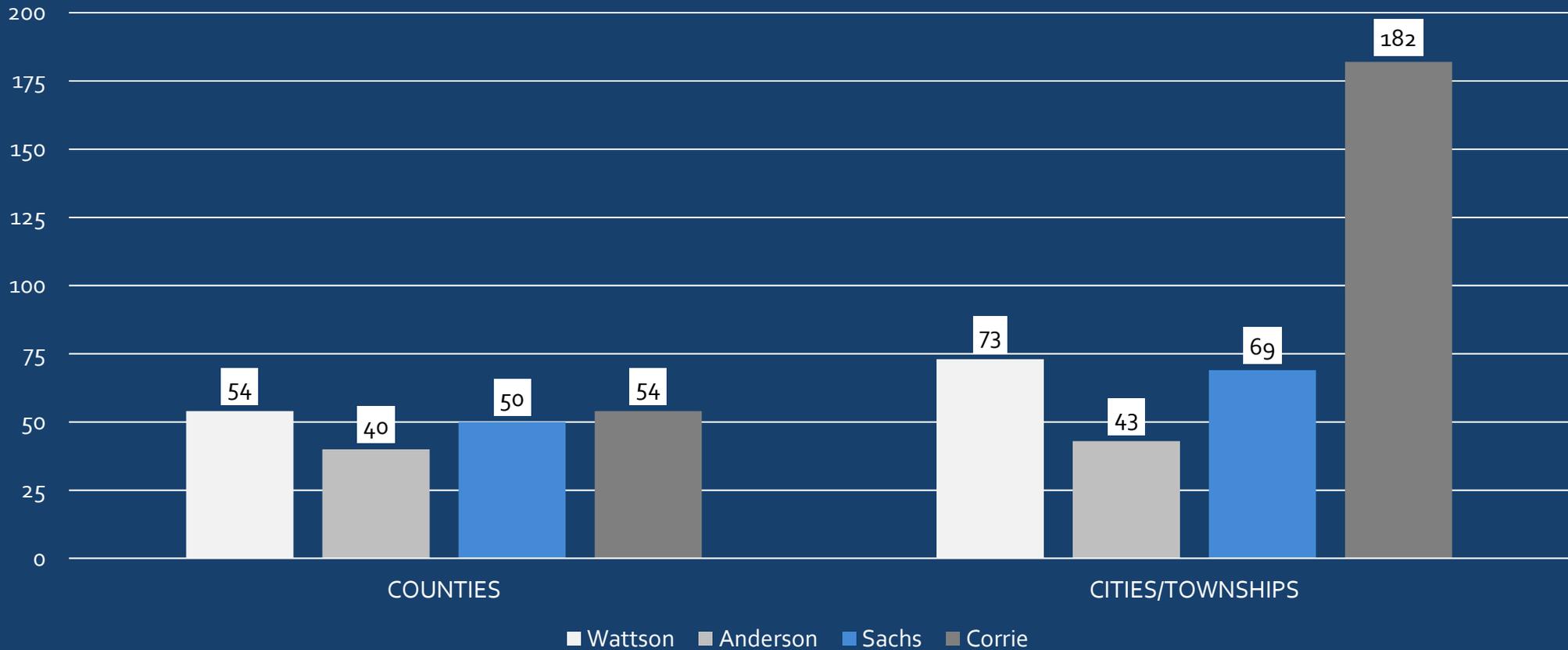


Political subdivisions must not be divided more than necessary to meet constitutional requirements. Order at 7 (citations omitted).

POLITICAL SUBDIVISION SPLITS – SENATE

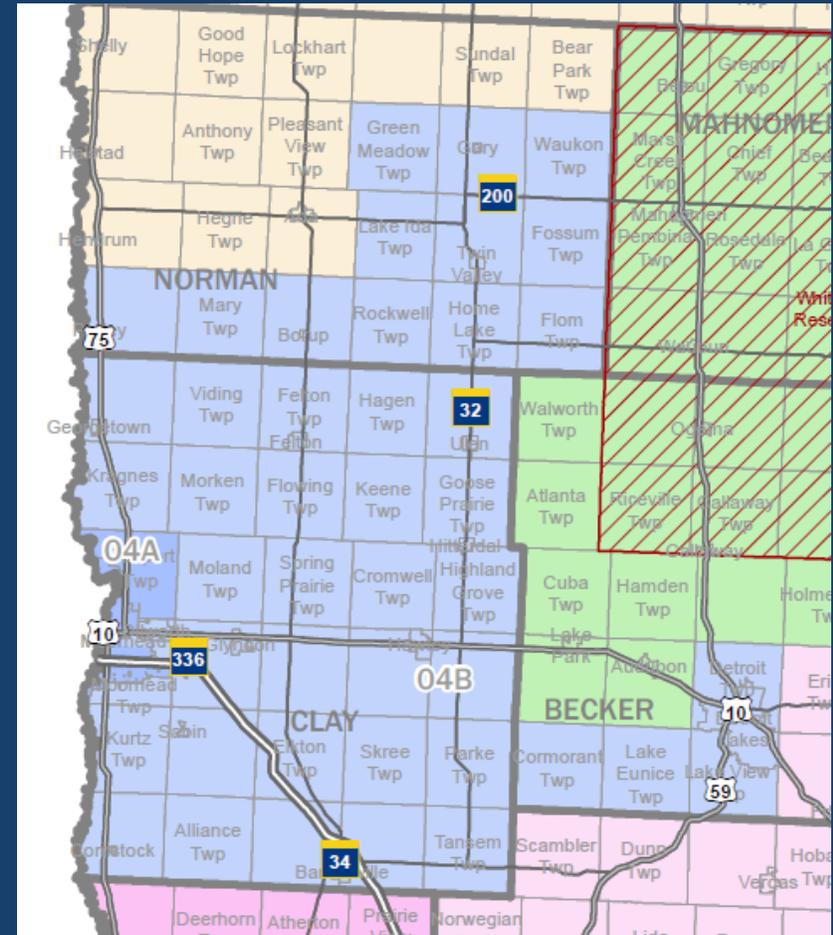


POLITICAL SUBDIVISION SPLITS - HOUSE



MOORHEAD – SD 4

- All but the Anderson Plaintiffs included Detroit Lakes in a Senate District with Moorhead.
- Consistent with the Panel's actions 10 years ago as well as the public testimony that Detroit Lakes shares a community of interest with Moorhead.

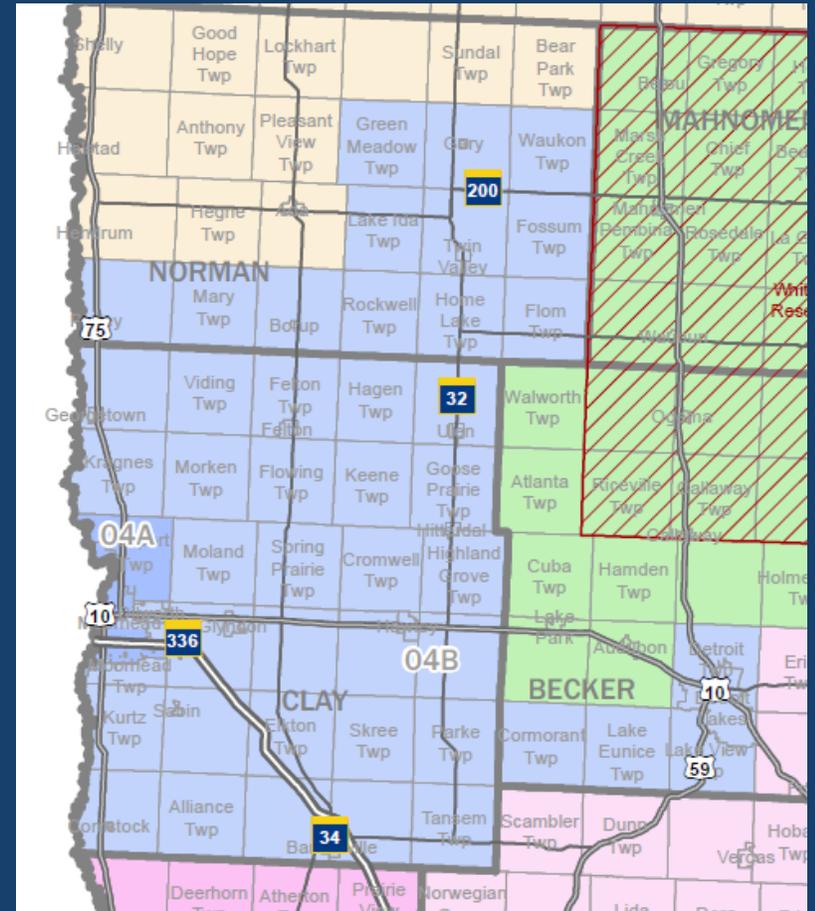


MOORHEAD – SD4

“It is one of the few senate districts in outstate Minnesota which is growing in population primarily because of the population growth that’s been happening here in Moorhead and in Detroit Lakes.”

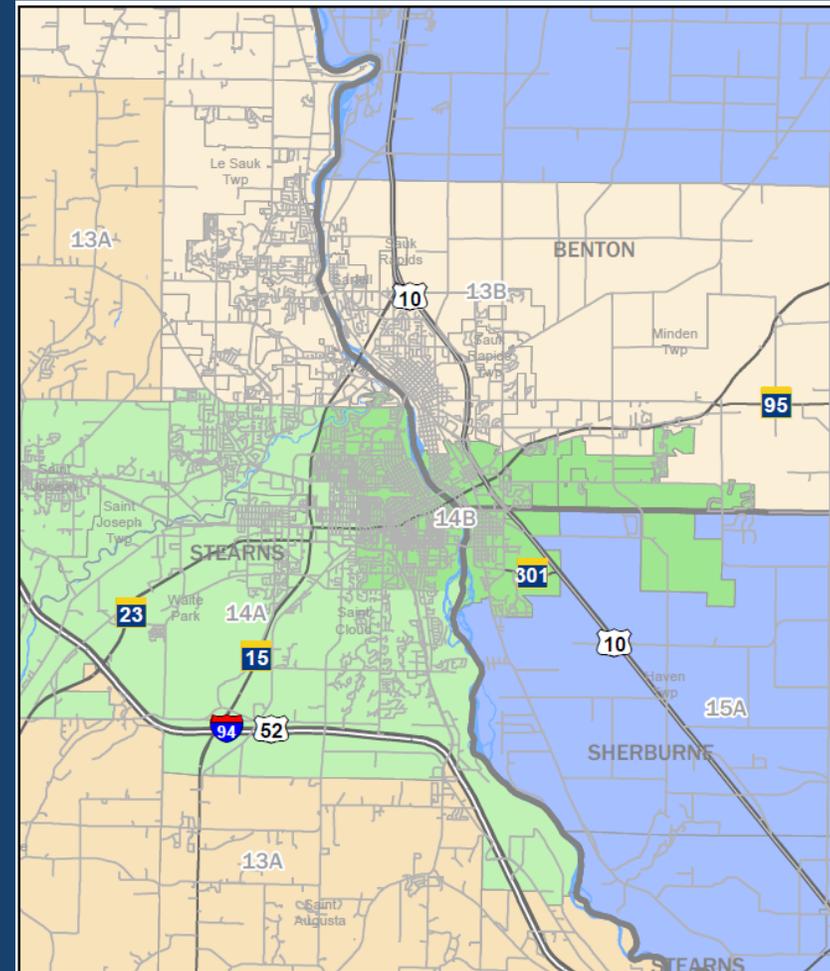
“It is especially worthy of note that U.S. Highway 10 has become a major economic corridor connecting Detroit Lakes and Moorhead – a linkage that has only grown more significant since the 2000 census, after which Becker County to our east and Clay County where we are now, were first put together in what is called Senate District 4.”

Lawrence Wohlrabe, Moorhead Tr. 19:1-16.



ST. CLOUD – SD 14

- All of Saint Cloud, St. Joseph, Waite Park
- Distinguishes urban and rural interests
- Creates compact, traversable districts
- Preserves minority voting rights



ST. CLOUD – SD 14

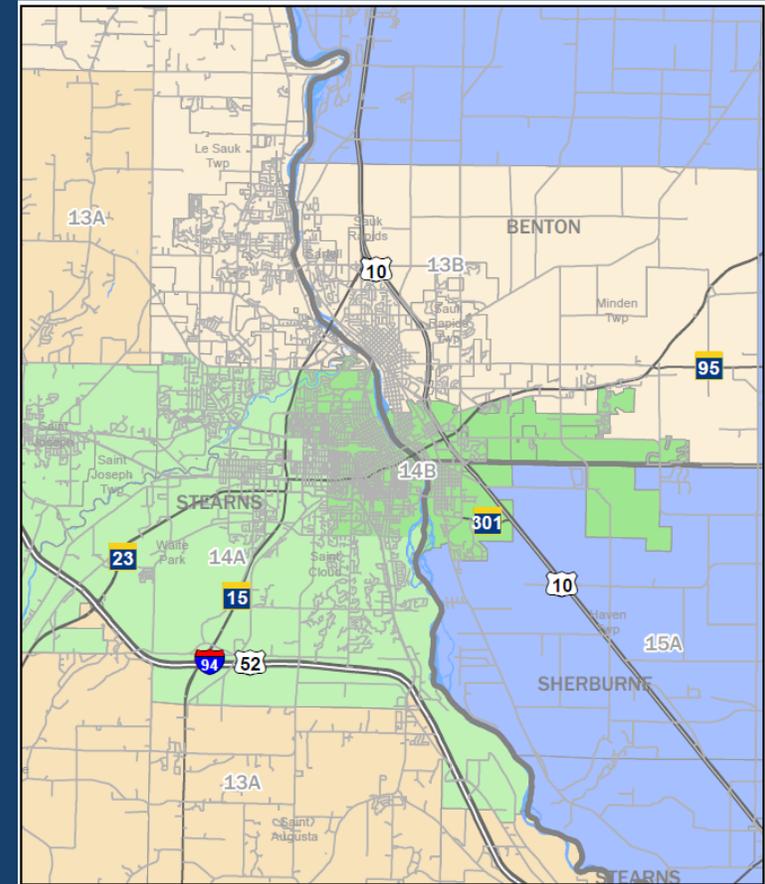
“[St. Cloud State University] could be considered a community of interest because of the diversity among students and their common interests.

“Currently, part of the SCSU campus is located south of University Drive and is included in MN House district 14A, while the part of the campus north of University Drive is included in 14B. Not only does this division reduce student representation, but it causes confusion among students as to which district they live in, where they vote, and who their candidates are.”

Judy Foster, Written Comments at 82

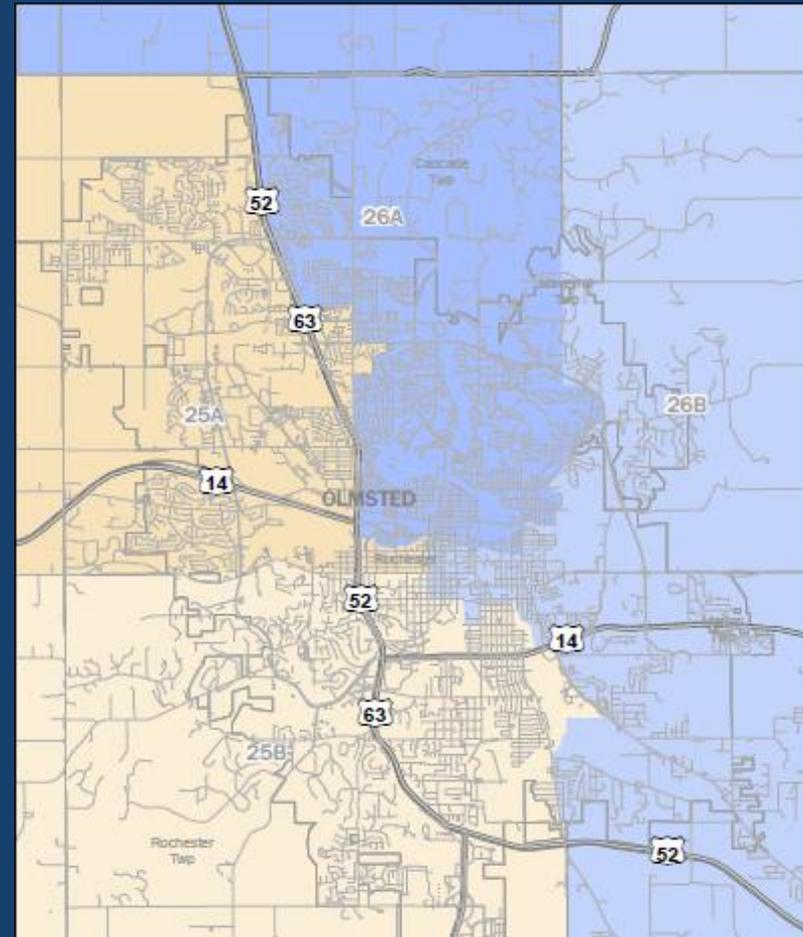
“It is very discouraging to hear the names, or meet the candidates in 14B, then show up at your polling place and not find them on the ballot because you are part of the few students in 14A.”

Marlene Haider, Written Comments at 212



ROCHESTER – SD 25 AND 26

- Over 80% of Rochester's population is in 25A, 25B, and 26A.
- 25A, 25B, and 26A are wholly contained within Olmsted County. 26B contains part of Wabasha County for population.
- Ensures that the minority communities on the outskirts of the City are able to vote with the City core, and not placed into more rural surrounding districts.

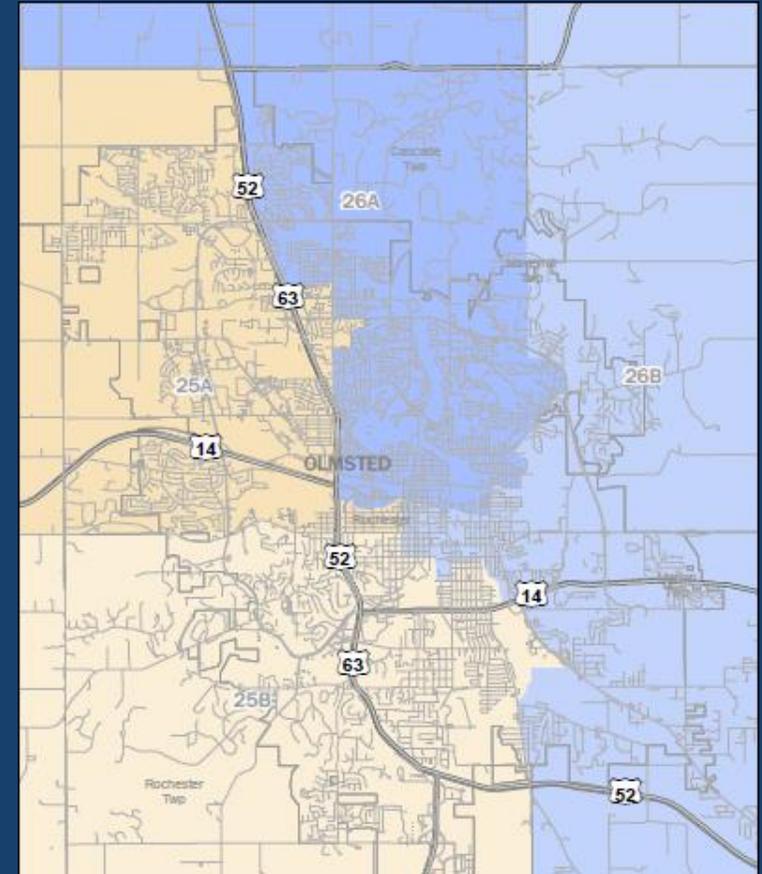


ROCHESTER – SD 25 AND 26

“The size of [Rochester’s] population calls for two [Senate] districts equally focused on the city. While a single core district entirely based within Rochester could be drawn, there would be unintended negative consequences for Rochester residents and the community of color that live in the city, who live in the peripheral district or districts that would result.

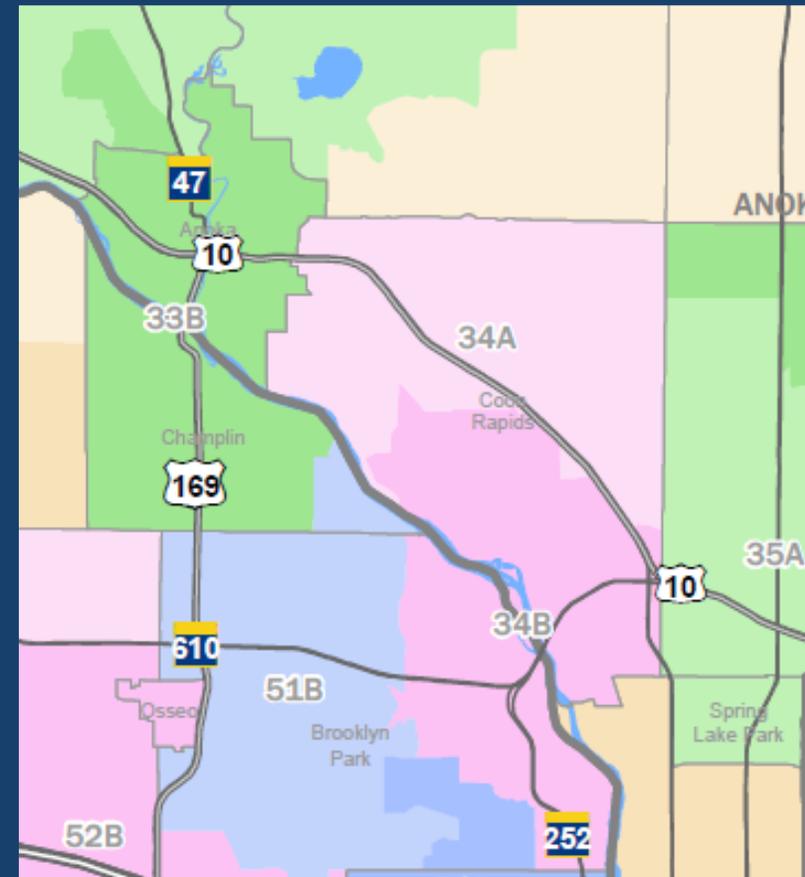
“For example, communities of color located more closely to the periphery of town would be at risk of being separated from other Rochester communities of interest and lumped in within the large rural district representing southeast Minnesota.”

Abdullahi Mohamed Adan, Rochester Tr. 46:18-47:4



CHAMPLIN/COON RAPIDS

- Strong public testimony against the current pairing of Champlin and Coon Rapids.
- The Cities share little in common, and the district is not traversable.
- Sachs SD 34 keeps Coon Rapids whole, and pairs southern Coon Rapids with northeastern Brooklyn Park, creating a minority opportunity district.
- Pairs Champlin with Anoka and Rogers to the north, connected by Highway 169.



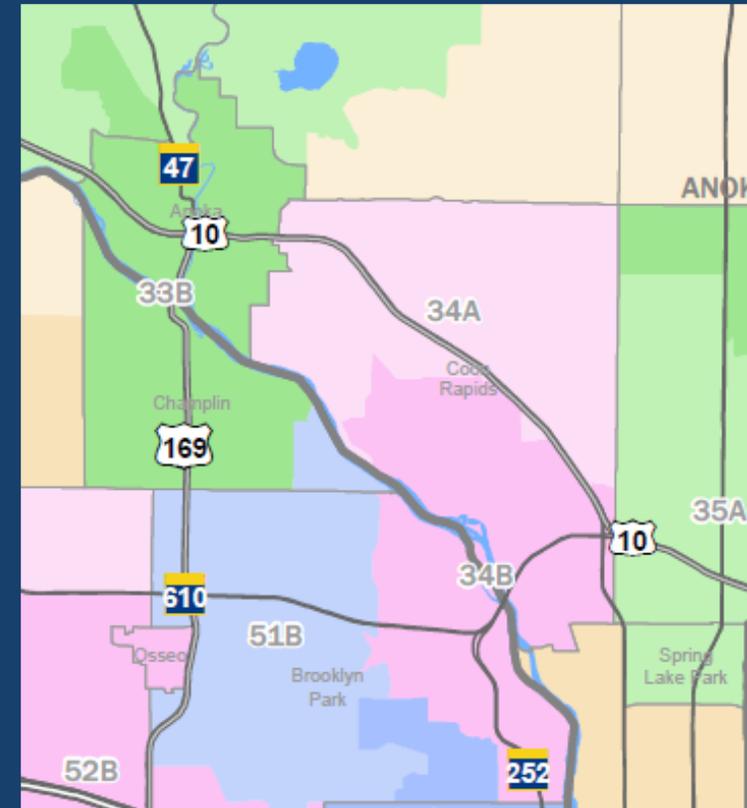
CHAMPLIN/COON RAPIDS

“For that reason, I’d recommend that the panel draft a state house district that accurately represents the civic life of Coon Rapids and the on-the-ground realities of the city. Such a district would reflect the tried-and-true geographical realities of the area, encompass the entire geographical and historical core of Coon Rapids, and enable Coon Rapids residents to have a district that reflects our thriving and growing community.”

Brett Ortler, Zoom Tr. 21:21-22:2

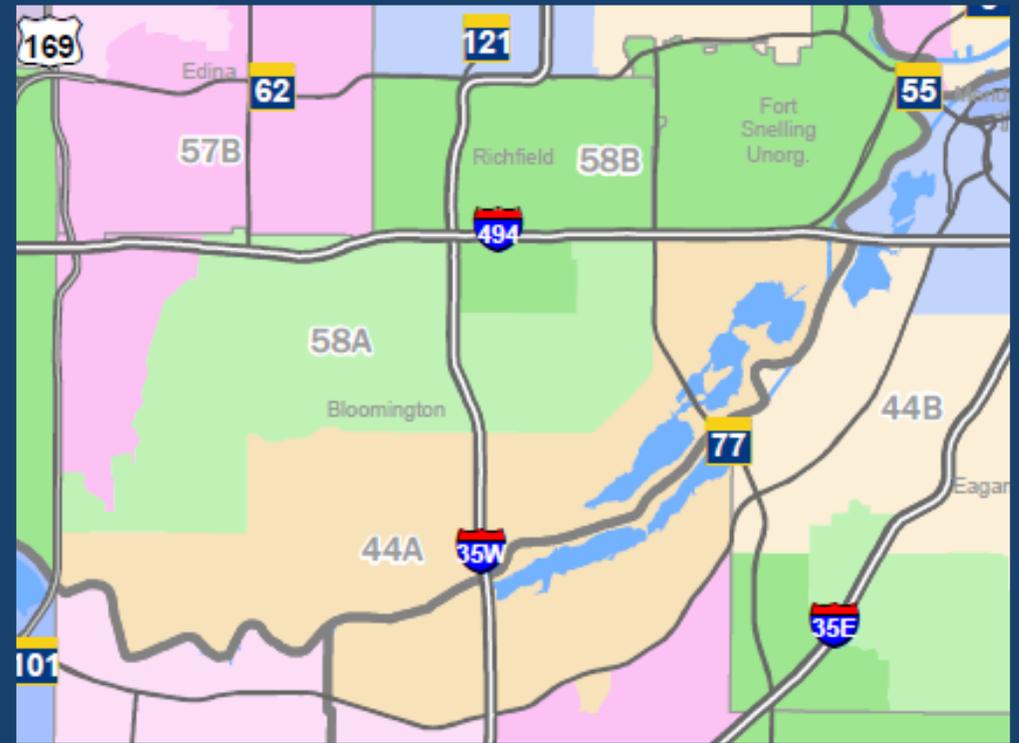
“For a city of over 60,000 people, we have been disadvantaged compared to our peer cities by lacking a singular voice for our city in either chamber.”

Testimony of Christopher Geisler, Zoom Tr. 26:14-17



SOUTHERN SUBURBS

- By comparison, testimony from the southern suburbs highlighted the community of interest that has formed on both sides of the Minnesota river.
- District 44A respects that community of interest, rather than arbitrarily using the River to divide districts.



SOUTHERN SUBURBS

“All three – Eagan, Burnsville, and Bloomington – are similarly suburban. They’re all vibrant, growing communities, and all home to increasingly diversifying populations. It really is one community connected by multiple bridges and roads. I-35 connects the hearts of Burnsville and Bloomington; Cedar Avenue goes from Apple Valley and near the new outlet mall in Eagan, to Bloomington beside the Mall of America, which itself connects the surrounding communities.”

James Johnson, Woodbury Tr. 15:21-16:5

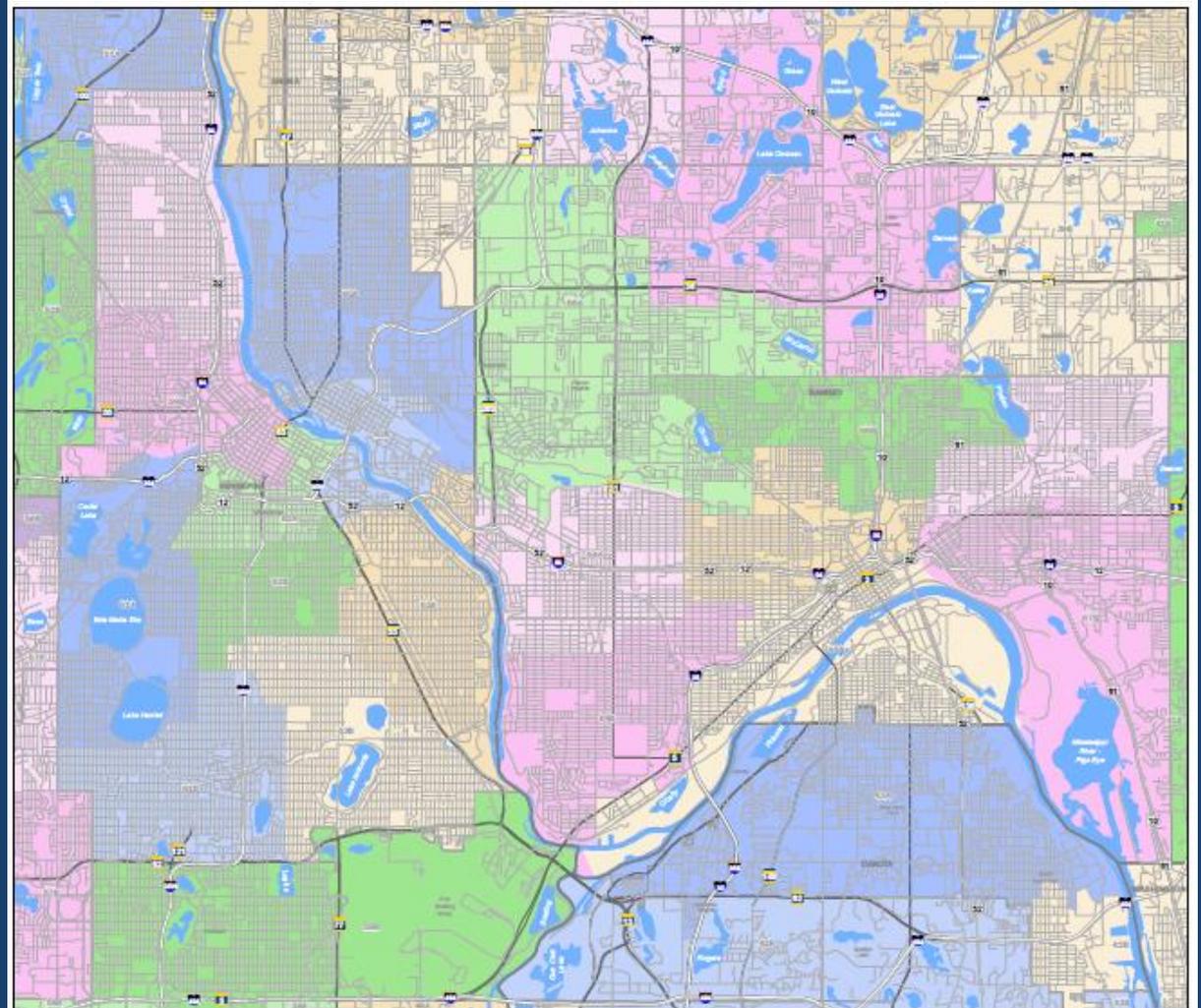
“The one thing that I feel like that region really unifies around is the river itself. And in the past, we’ve had a lot of time of where governments and organizations kind of dropped political boundaries on rivers. And I feel like in our area of the metro, really the river is what unites us and what makes us all in common in that area.”

Maxwell Collins, Minneapolis Tr. 21:12-18

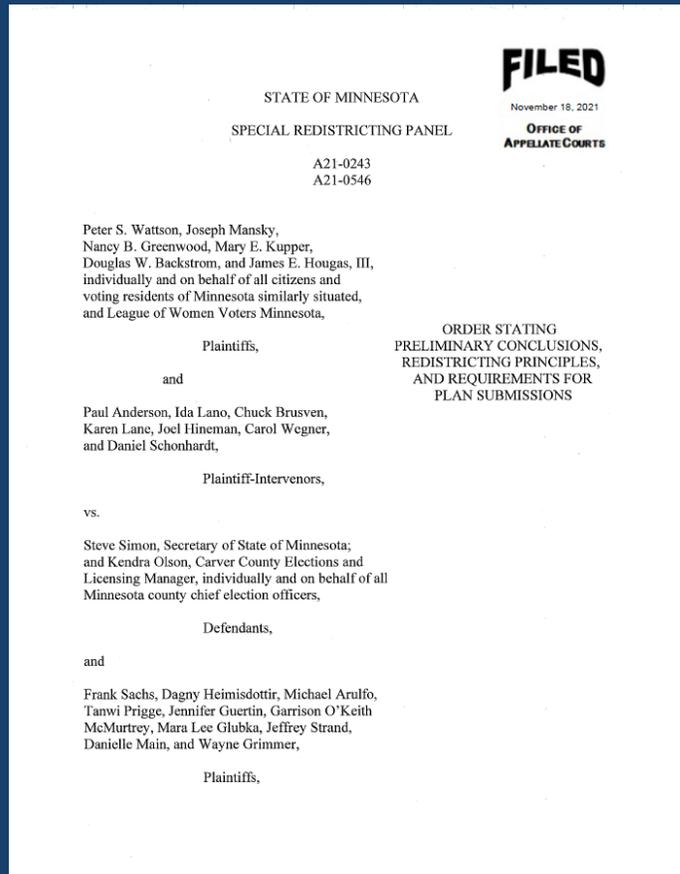


TWIN CITIES

- Minneapolis is kept whole within 10 House and 5 Senate Districts.
- St. Paul is wholly within 8 House Districts, crossing the border only once to include Falcon Heights, Lauderdale, and part of Roseville, around the State Fair.



CONTIGUOUS, CONVENIENT, AND COMPACT



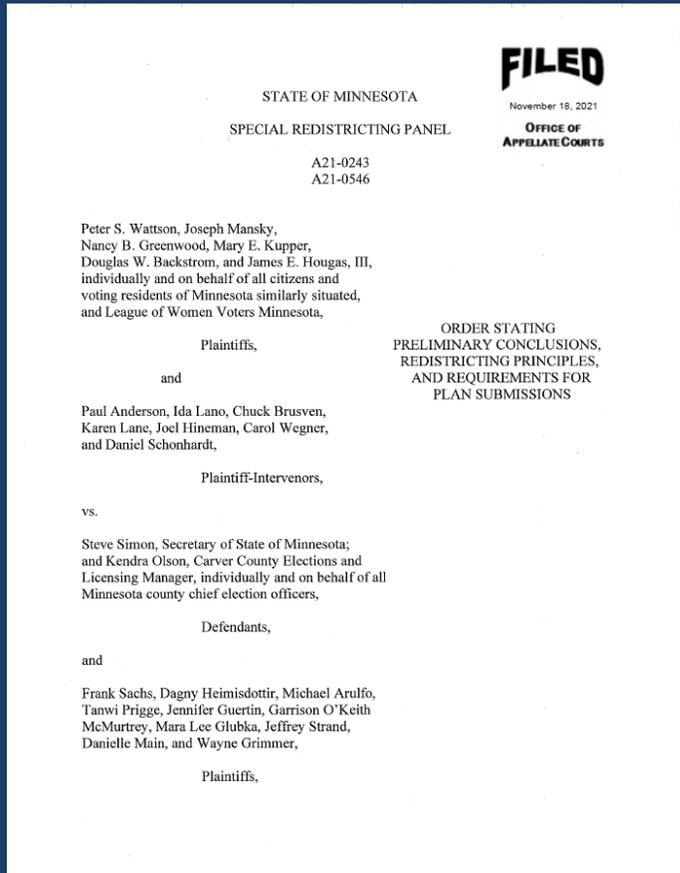
Districts must consist of convenient, contiguous territory. Contiguity by water is sufficient if the body of water does not pose a serious obstacle to travel within the district. Districts with areas that connect at a single point will not be considered contiguous. Order at 6-7 (citations omitted).

As a factor subordinate to all other redistricting principles, districts should be reasonably compact. Order at 7 (citations omitted).

CONTIGUOUS, CONVENIENT, AND COMPACT

- All parties achieve contiguous districts
- All parties achieve similar measures of compactness
- All parties agree that all Sachs districts are convenient

THE SACHS LEGISLATIVE PLAN IS NOT PARTISAN



*Districts must not be drawn with the purpose of protecting, promoting, or defeating any incumbent, candidate, or political party. The panel will not draw districts based on the residence of incumbent office holders **and will not consider past election results when drawing districts.** Order at 6 (citations omitted).*

THE SACHS LEGISLATIVE PLAN IS NOT PARTISAN

The Sachs Legislative Plan was prepared to embrace all of the Panel's Redistricting Principles and respond to the public testimony.

- *It **was not** prepared to favor or oppose incumbents.*
- *It **was not** prepared to favor particular candidates.*
- *It **was not** prepared to favor the Minnesota DFL Party.*